

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:
MIDNIGHT MADNESS DISTILLING LLC,
Debtor.**

**CHAPTER 7
Case No. 21-11750-PMM**

**BONNIE B. FINKEL, in her capacity as Chapter 7
Trustee for Midnight Madness Distilling LLC,**

Adv. No. 23-00047-PMM

Plaintiff,

v.

CASEY PARZYCH, et al.,

Defendants.

**DECLARATION OF ANDREW J. BELLi IN SUPPORT
OF THE TRUSTEE'S OPPOSITION TO MOVING
DEFENDANTS' MOTION TO DISMISS AMENDED COMPLAINT**

I, Andrew J. Belli, hereby declare as follows:

1. I am counsel to Bonnie B. Finkel, the Chapter 7 Trustee (the "Trustee") for the Debtor, in the above-captioned adversary proceeding.
2. I make this declaration on my own knowledge and belief in support of the Trustee's opposition to Moving Defendants' Motion to Dismiss Amended Complaint (the "Opposition").
3. True and correct copies of the documents cited in the Opposition are attached hereto as follows:

| Ex. | Description |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A | Transcript of 9/15/2021 Rule 363 Hearing (Bankr. D.I. 189) |
| B | Docket Sheet from <i>Lorubbio v. Parzych, et al.</i> , Bucks County CCP No. 2021-01816 |
| C | Defendants' Memorandum of Law In Support of Motion for Summary Judgment, filed on 7/15/2023 in <i>Lorubbio v. Parzych, et al.</i> , Bucks County CCP No. 2021-01816 |
| D | 9/20/21 email from William Burnett to Patricia Jefferson attaching executed Asset Purchase Agreement between Debtor and Millstone |
| E | 9/15/21 email from Harry Giacometti to Eileen Godfrey attaching Exhibit List and Exhibit 5 re: Section 363 Hearing |
| F | 10/25/24 Conditional Assignment of Claims and Declaration of Robert Cassell |

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 29, 2024

/s/ Andrew J. Belli
Andrew J. Belli
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